

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:)	
FREE SPEECH SYSTEMS LLC,)	Chapter 11 (Subchapter V)
)	
Debtor)	Case No. 22-60043 (CML)
)	
In re:)	Chapter 11
ALEXANDER E. JONES,)	
)	Case No. 22-33553 (CML)
Debtor)	
)	

**SANDY HOOK FAMILIES’
CONSOLIDATED WITNESS AND EXHIBIT LIST**

Judge	Hon. Christopher M. Lopez
Hearing Date	Monday, November 27, 2023
Hearing Time	2:00 p.m. (CT)
Party’s Name	Sandy Hook Families (as defined below)
Attorney’s Names	Ryan Chapple (Connecticut Plaintiffs) Avi Moshenberg, Jarrod Martin, Jennifer Hardy (Texas Plaintiffs)
Attorney’s Phone	512-477-5000 (Ryan Chapple) 713-337-5580 (Avi Moshenberg) 713-356-1280 (Jarrod Martin) 713-510-1766 (Jennifer Hardy)
Nature of Proceeding	Cash Collateral Motion [22-60043 Dkt. 6] Motion for Entry of an Order Authorizing Rejection of Certain Executory Contracts [22-33553 Dkt. 244] Motion to Assume Existing Book Contract and Approve New Contract [22-33553 Dkt. 368]

Neil Heslin, Scarlett Lewis, Leonard Pozner, Veronique De La Rosa, and Marcel Fontaine (collectively, the “Texas Plaintiffs”) and David Wheeler, Francine Wheeler, Jacqueline Barden, Mark Barden, Nicole Hockley, Ian Hockley, Jennifer Hensel,

Donna Soto, Carlee Soto Parisi, Carlos M. Soto, Jillian Soto-Marino, William Aldenberg, William Sherlach, and Robert Parker (collectively, the “Connecticut Plaintiffs” and together, the “Sandy Hook Families”) hereby submit this Consolidated Witness and Exhibit List (Witness and Exhibit List) in connection with the hearing on (a) *Debtor’s Emergency Motion for an Interim and Final Orders (I) Authorizing the Use of Cash Collateral Pursuant to Sections 105, 361, and 363 of the Bankruptcy Code and Federal Rule of Bankruptcy Procedure 4001(B) and (II) Granting Adequate Protection to the Pre-Petition Secured Lender* [22-60043 Dkt. 6]; (b) *Debtor’s Motion for Entry of an Order Authorizing Rejection of Certain Executory Contracts* [22-33553 Dkt. 244]; and (c) *Debtor’s Motion to Assume Existing Book Contract Pursuant to 11 U.S.C. § 365 and Approve New Contract Pursuant to 11 U.S.C. §§ 105 and 363(b)* [22-33553 Dkt. 368], to be held on Monday, November 27, 2023, at 2:00 p.m. (Central Time):

The Sandy Hook Families reserve the right to supplement, amend, or revise this Witness and Exhibit List at any time prior to the hearing. The Sandy Hook Families reserve the right to supplement the Witness and Exhibit List with new witnesses and additional exhibits. Further, the Sandy Hook Families reserve the right to use any exhibits presented by any other party and to ask the Court to take judicial notice of any document. The Sandy Hook Families further reserve the right to introduce exhibits previously admitted.

WITNESS LIST

The Sandy Hook Families may call the following witnesses at the hearing:

1. Patrick Magill, Chief Restructuring Officer of Debtor;
2. Any witness necessary to rebut the testimony of any witness called or designated by any other parties;
3. Any witness listed or called by any other party.

EXHIBIT LIST

The Sandy Hook Families may offer for admission into evidence any of the following exhibits at the hearing:

No.	Description	Offered	Objection	Admitted/ Not Admitted	Disposition
1.	Debtor's Emergency Motion for an Interim and Final Orders (I) Authorizing the Use of Cash Collateral Pursuant to Sections 105, 361, and 363 of the Bankruptcy Code and Federal Rule of Bankruptcy Procedure 4001(b) and (II) Granting Adequate Protection to the Pre-Petition Secured Lender [Dkt. 6]				
2.	Declaration of W. Marc Schwartz in Support of Voluntary Petition and First Day Motions [Dkt. 10]				
3.	Interim Order Authorizing Debtor's Use of Cash Collateral and Providing Partial Adequate Protection [Dkt. 41]				
4.	Order Modifying Interim Order Authorizing Debtor's Use of Cash Collateral and Providing Partial Adequate Protection [Dkt. 64]				
5.	Second Interim Order Authorizing Debtor's Use of Cash Collateral and Providing Partial Adequate Protection [Dkt. 98]				

6.	Third Interim Order Authorizing Debtor's Use of Cash Collateral and Providing Partial Adequate Protection [Dkt. 151]				
7.	Fourth Interim Order Authorizing Debtor's Use of Cash Collateral and Providing Partial Adequate Protection [Dkt. 238]				
8.	Fifth Interim Order Authorizing Debtor's Use of Cash Collateral and Providing Partial Adequate Protection [Dkt. 258]				
9.	Sixth Interim Order Authorizing Debtor's Use of Cash Collateral and Providing Partial Adequate Protection [Dkt. 287]				
10.	Seventh Interim Order Authorizing Debtor's Use of Cash Collateral and Providing Partial Adequate Protection [Dkt. 333]				
11.	Eighth Interim Order Authorizing Debtor's Use of Cash Collateral and Providing Partial Adequate Protection [Dkt. 403]				
12.	Ninth Interim Order Authorizing Debtor's Use of Cash Collateral and Providing Partial Adequate Protection [Dkt. 459]				
13.	Tenth Interim Order Authorizing Debtor's Use of Cash Collateral and Providing Partial Adequate Protection [Dkt. 535]				

14.	Eleventh Interim Order Authorizing Debtor's Use of Cash Collateral and Providing Partial Adequate Protection [Dkt. 571]				
15.	Twelfth Interim Order Authorizing Debtor's Use of Cash Collateral and Providing Partial Adequate Protection [Dkt. 607]				
16.	Thirteenth Interim Order Authorizing Debtor's Use of Cash Collateral and Providing Partial Adequate Protection [Dkt. 643]				
17.	Fourteenth Interim Order Authorizing Debtor's Use of Cash Collateral and Providing Partial Adequate Protection [Dkt. 682]				
18.	Fifteenth Interim Order Authorizing Debtor's Use of Cash Collateral and Providing Partial Adequate Protection [Dkt. 710]				
19.	Sixteenth Interim Order Authorizing Debtor's Use of Cash Collateral and Providing Partial Adequate Protection [Dkt. 725]				
20.	Debtor's Notice of Cash Collateral Budget for November 2023 with Consent of Secured Creditor [Dkt. 749]				
21.	Joint Objection of the Sandy Hook Families to Debtor's Notice of Cash Collateral Budget for November 2023 with Consent of Secured Creditor [Dkt. 758]				

22.	Alexander Jones' Motion for Allowance and Payment of Administrative Expenses Pursuant to 11 U.S.C. § 503(b)(1) [Dkt. 659]				
23.	Alexander E. Jones's Notice of Withdrawal of Motion for Allowance and Payment of Administrative Expenses Pursuant to 11 U.S.C. § 503(b)(1) [Dkt. 744]				
24.	Debtors' Joint Motion to Approve Employment Contract Pursuant to 11 U.S.C. §§ 105 and 363(b) [Dkt. 707]				
25.	Joint Objection of the Sandy Hook Families to Debtors' Joint Motion to Approve Employment Contract Pursuant to 11 U.S.C. §§ 105 and 363(b) [Dkt. 740]				
26.	The Official Committee of Unsecured Creditors' (I) Reservation of Rights in Respect of Alexander Jones's Motion for Allowance and Payment of Administrative Expenses Pursuant to 11 U.S.C. § 503(b)(1) to the Extent Such Motion is Not Withdrawn and (II) Limited Objection and Joinder in Respect of Joint Motion to Approve Employment Contract Pursuant to 11 U.S.C. §§ 105 and 363(b) [Dkt. 741]				
27.	Amended Complaint [23-03127 Dkt. 5]				

28.	Joint Motion of the Sandy Hook Families for Entry of an Order Pursuant to Federal Rule 24 and Bankruptcy Rule 7024 Permitting Intervention in PQPR Adversary Proceeding [23-03127 Dkt. 2]				
	Any document or pleading filed in the above-captioned case				
	Any exhibits identified or offered by any other party				
	Any exhibits necessary for impeachment and/or rebuttal purposes				

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Respectfully submitted this 22nd day of November 2023.

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Co-Counsel to the Connecticut Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Witness and Exhibit List has been served on counsel for Debtors, Debtors, and all parties receiving or entitled to notice through CM/ECF on this 22nd day of November 2023.

/s/ Ryan E. Chapple

Ryan E. Chapple